

**IN THE DISTRICT COURT OF THE VIRGIN ISLANDS
DIVISION OF ST. CROIX**

PETRO INDUSTRIAL SOLUTIONS, LLC
(PETRO),

Plaintiff,

vs.

ISLAND PROJECT AND OPERATING
SERVICES, LLC, VITOL US HOLDING II
CO., VITOL VIRGIN ISLANDS CORP,
ANDREW CANNING and OPTIS
EUROPE, LTD.,

Defendants.

CASE NO. 1:21-CV-00312

BREACH OF CONTRACT

JURY TRIAL DEMANDED

**NOTICE OF SERVICE OF PLAINTIFF PETRO'S RESPONSE TO DEFENDANT IPOS'
SECOND SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS**

PLEASE TAKE NOTICE that Plaintiff, PETRO, has served its Response to Defendant IPOS's Second Set of Requests for Production of Documents, through its respective counsel, and that said documents were served upon the Defendant in the original.

RESPECTFULLY SUBMITTED
LEE J. ROHN AND ASSOCIATES, LLC
Attorneys for Plaintiff

DATED: June 9, 2023

BY: /s/ Lee J. Rohn

Lee J. Rohn, Esq.
VI Bar No. 52
1108 King Street, Suite 3 (mailing)
56 King Street, Third Floor (physical)
Christiansted, St. Croix
U.S. Virgin Islands 00820
Telephone: (340) 778-8855
lee@rohnlaw.com

**PETRO INDUSTRIAL SOLUTIONS, LLC V. IPOS ET AL CASE NO. 1:21-CV-00312
NOTICE OF SERVICE OF PLAINTIFF PETRO'S RESPONSE TO DEFENDANT IPOS' SECOND SET
OF REQUESTS FOR PRODUCTION OF DOCUMENTS**

Page 2

CERTIFICATE OF SERVICE

THIS IS TO CERTIFY that on June 9, 2023, I electronically filed the foregoing with the Clerk of the Court using the electronic filing system, which will send a notification of such filing to the following:

Alex Kaplan, Esq.
Susman Godfrey
1000 Louisiana St., Suite 5100
Houston, TX 77002
Email Address: akaplan@susmangodfrey.com
Attorney For: Vitol Virgin Islands Corp. and VITOL US Holding II Co.

Andrew C. Simpson, Esq.
Andrew C. Simpson, P.C.
2191 Church Street, Suite 5
Christiansted, VI 00820
Email Address: asimpson@coralbrief.com; coralbrief@gmail.com;
jaycie.jorgensen@gmail.com
Attorney For: Andrew Canning and OPTIS Europe, Ltd.

Carl A. Beckstedt, III, Esq.
Beckstedt & Kuczynski LLP
2162 Church Street
Christiansted, USVI 00820
Email Address: carl@beckstedtlaw.com; tarsha@beckstedtlaw.com
Attorney For: Vitol Virgin Islands Corp. and VITOL US Holding II Co.

Y. Gloria Park, Esq.
Sarah Hanningan, Esq.
Susman Godfrey, LLP
1301 Avenue of the Americas, 32nd Floor
New York, NY 10019
Email Address: GPark@susmangodfrey.com; shannigan@susmangodfrey.com
Attorney For: Vitol US Holding Co., Vitol Virgin Islands Corp. and VITOL US Holding II Co.

Simone Francis, Esq.
Ogletree, Deakins, Nash, Smoak & Stewart, LLC
The Tunick Building, Suite 201
1336 Beltjen Road
St. Thomas, VI 00802
Email Address: simone.francis@ogletreedeakins.com
Attorney For: Island Project and Operating Services, LLC

BY: /s/ Lee J. Rohn (raw)